

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

_____.X
In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD)(SN)
ECF Case

_____.X
This document relates to:

Estate of John Patrick O'Neill Sr., et al. v. Al Baraka Investment and Development Corporations, et al., 1:04-cv-01923 (GBD)(SN)
Gladys Lopez et al v. Islamic Republic of Iran, No. 1:23-cv-08305 (GBD)(SN)

NOTICE OF MOTION TO DISMISS WITHOUT PREJUDICE

PLEASE TAKE NOTICE that upon the supporting Declaration of Jeremy Shockett, Esq., undersigned counsel respectfully moves this Court for an Order:

- (1) dismissing without prejudice the claims filed on behalf of Michael Reynolds;
- (2) granting such other and further relief as this Honorable Court deems just and proper.

Date: July 8, 2025

/s/ Jerry S. Goldman

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